

**CAMPBELL & WILLIAMS**  
 ATTORNEYS AT LAW  
 700 SOUTH SEVENTH STREET, LAS VEGAS, NEVADA 89101  
 Phone: 702.382.5222 • Fax: 702.382.0540  
 www.campbellandwilliams.com

CAMPBELL & WILLIAMS  
 DONALD J. CAMPBELL, ESQ. (1216)  
[dj@campbellandwilliams.com](mailto:djc@campbellandwilliams.com)  
 J. COLBY WILLIAMS, ESQ. (5549)  
[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)  
 700 South Seventh Street  
 Las Vegas, Nevada 89101  
 Telephone: (702) 382-5222  
 Facsimile: (702) 382-0540

*Attorneys for Defendants  
 Zuffa, LLC and Dana White*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MARK HUNT, an individual,	)	Case No. 2:17-cv-00085-JAD-CWH
	)	
Plaintiffs,	)	
	)	<b>MOTION FOR LEAVE TO REDACT</b>
vs.	)	<b>PORTION OF DEFENDANTS</b>
	)	<b>ZUFFA LLC'S AND DANA WHITE'S</b>
ZUFFA, LLC d/b/a ULTIMATE FIGHTING	)	<b>REPLY IN SUPPORT OF MOTION</b>
CHAMPIONSHIP, a Nevada limited liability	)	<b>TO DISMISS AMENDED</b>
company; BROCK LESNAR, an individual;	)	<b>COMPLAINT PURSUANT TO</b>
and DANA WHITE, an individual; and DOES	)	<b>FED. R. CIV. P. 12(b)(6)</b>
1-50, inclusive,	)	
	)	
Defendants.	)	
_____	)	

Defendants Zuffa, LLC and Dana White, pursuant to Fed. R. Civ. P. 26(c), LR IA 10-5 and supporting case law, respectfully request that the Court permit them to redact a portion of their Reply in Support of Motion to Dismiss Amended Complaint Pursuant to Fed. R. Civ. 12(b)(6) (“Reply”).

**BACKGROUND**

Defendants seek to redact a portion of their Reply that quotes a section of the Promotional and Ancillary Rights Agreement dated April 12, 2016 between Zuffa and Plaintiff Mark Hunt (“2016 Promotional Agreement”). Hunt previously filed the 2016 Promotional Agreement in

1 this action as part of his Appendix to the Complaint. *See* ECF Nos. 1-7; 2. The 2016  
2 Promotional Agreement contains a confidentiality provision. The Court previously granted  
3 Hunt's motion to seal this document. *See* ECF No. 10. The Court has likewise granted  
4 Defendants' motion to seal similar contracts between the parties. *See* ECF No. 86.

### 5 ARGUMENT

6 Documents filed in connection with a non-dispositive motion may be sealed if the party  
7 seeking to seal the documents makes a "particularized showing" under the "good cause" standard  
8 of Rule 26(c). *See Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir.  
9 2006) (citations and internal quotation marks omitted); *see also Pintos v. Pacific Creditors*  
10 *Ass'n*, 605 F.3d 665, 678 (9th Cir. 2010). The Court has "broad latitude" under Rule 26(c) "to  
11 prevent disclosure of materials for many types of information, including, but not limited to, trade  
12 secrets or other confidential research, development, or commercial information." *Phillips v.*  
13 *General Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002) (citations omitted); *see also Selling*  
14 *Source, LLC v. Red River Ventures, LLC*, 2011 WL 1630338, at \*2 (D. Nev. April 29, 2011)  
15 (finding good cause to seal information regarding finances, contractual agreements, and  
16 information regarding particular arrangements with customers).

17 The 2016 Promotional Agreement between Zuffa and Hunt contains proprietary  
18 information and has already been sealed by the Court. Zuffa does not seek to seal its entire  
19 Reply. Instead, Zuffa seeks leave to redact a very limited portion of the Reply that quotes from  
20 the sealed Promotional Agreement. The rest of the Reply will be available to the public.  
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CONCLUSION

For the foregoing reasons, Defendants respectfully request that Zuffa be permitted to redact a portion of its Reply being filed concurrently herewith.

DATED this 27th day of July, 2017.

CAMPBELL & WILLIAMS

By /s/ J. Colby Williams  
DONALD J. CAMPBELL, ESQ. (#1216)  
J. COLBY WILLIAMS, ESQ. (#5549)  
700 South Seventh Street  
Las Vegas, Nevada 89101

*Attorneys for Defendants  
Zuffa, LLC and Dana White*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **Motion for Leave to Redact Portion of Defendants Zuffa, LLC's and Dana White's Reply in Support of Motion to Dismiss First Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6)** was served on the 27th day of July, 2017 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ J. Colby Williams  
An employee of Campbell & Williams

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